

EXHIBIT 1

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February 16, 2012

VIA ELECTRONIC AND REGULAR MAIL

Kristi C. Kelly, Esq.
Surovell, Isaacs, Petersen & Levy, PLC
4010 University Drive, Suite 200
Fairfax, VA 22030

Re: *Sandra J. Berrios v. Experian Information Solutions, Inc., et al.*
U.S. District Court for the Eastern District of Virginia;
Civil Action No. 1:11-cv-01130-AJT-IDD

Dear Kristi:

Pursuant to our phone conversation, I am agreeable to telling you which requests we believe have been complied with pursuant to your agreement to restrict each request to a Relevant Period of January 1, 2008. As I mentioned, no global date restriction was included in your First Request for Production of Documents.

Subject to that understanding, here are the requests for which responsive documents have been produced, and none have been withheld to the best of our knowledge (except those in the privilege log we already provided):

Request Nos. 1, 2, 3, 4, 5, 7, 8, 9 (as narrowed by agreement),
10, 11, 16, 19, 20 (as narrowed by agreement), 21, 22, 23
(combined with 9 and 20 by agreement), 24, 26.

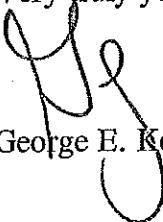
I understand you have withdrawn Request No. 27, 28, and 29. The responses to Request Nos. 12 and 13 can be gleaned from our responses to Request Nos. 7, 9, 10, and 11.

Kristi C. Kelly, Esq.
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Because your requests generally have no time limitation, I maintain my scope objection. Anything responsive that Flagstar has concerning Ms. Berrios has been produced or is on our privilege log. Moreover, the objections asserted meet the requests as currently phrased, so we decline your invitation to withdraw them.

If there are documents that you are still requesting that fall outside the above requests, please let me know.

Very truly yours,


George E. Kostel

GEK:kas

cc: Scott Surovell, Esq. (e-mail only)